

Hearing Date and Time: April 29, 2010 at 9:45 a.m. (Prevailing Eastern Time)

Timothy F. Nixon
Carla O. Andres (*Pro Hac Vice*)
GODFREY & KAHN, S.C.
780 North Water Street
Milwaukee, Wisconsin 53202
Telephone: (414) 273-3500
Facsimile: (414) 273-5198

Attorneys for Fee Examiner

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
	:	
In re:	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026
f/k/a General Motors Corp., <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors.	:	Honorable Robert E. Gerber
	:	
-----	X	

**STIPULATION AND ORDER FOR ADJOURNMENT OF
APRIL 29, 2010 HEARING ON FIRST INTERIM FEE
APPLICATION OF BROWNFIELD PARTNERS, LLC**

**TO: THE HONORABLE ROBERT E. GERBER
U.S. BANKRUPTCY JUDGE**

STIPULATION

The Fee Examiner of General Motors Corporation (n/k/a/ Motors Liquidation Company), appointed on December 23, 2009, and Brownfield Partners, LLC (“**Brownfield**”) hereby stipulate and agree that the Court may enter an order adjourning the April 29, 2010 hearing on the *First Interim Application of Brownfield Partners, LLC as Environmental Consultants to the Debtors for Allowance of Compensation and Reimbursement of Expenses for the Period from*

June 1, 2009 through September 30, 2009 [Docket No. 4457] (“**Brownfield’s First Interim Fee Application**”) on the following terms:

i. The Fee Examiner will submit a preliminary report on Brownfield’s First Interim Fee Application contemporaneously with his reports on all of the other first interim fee applications but will defer any specific objections or recommendations pending his receipt and review of supplemental detail to be provided by Brownfield in support of Brownfield’s First Interim Fee Application.

ii. The hearing on Brownfield’s First Interim Fee Application will be held on the same date as the *Second Interim Application of Brownfield Partners, LLC as Environmental Consultants to the Debtors for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2009 through January 31, 2010* [Docket No. 5291] anticipated for June, 2010.

Dated: Madison, Wisconsin
April 21, 2010.

GODFREY & KAHN, S.C.

By: /s/ Carla O. Andres
Timothy F. Nixon (TN 2644)
Carla O. Andres (CA 3129)

GODFREY & KAHN, S.C.
780 North Water Street
Milwaukee, Wisconsin 53202
Telephone: (414) 273-3500
Facsimile: (414) 273-5198
E-mail: tnixon@gklaw.com
candres@gklaw.com

Attorneys for Fee Examiner

MCCARTER & ENGLISH, LLP

By: /s/ Jeffrey Testa
Jeffrey Testa

MCCARTER & ENGLISH, LLP
100 Mulberry Street
Four Gateway Center
Newark, NJ 07102
Telephone: (973) 639-7939
Facsimile: (973) 297-6230
E-mail: jtesta@mccarter.com

Attorneys for Brownfield Partners, LLC

SO ORDERED, this
28th day of April, 2010

s/ Robert E. Gerber
Hon. Robert E. Gerber
United States Bankruptcy Judge